

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
SHARON T. MYRICK	:	BK. No. 17-11127 JKF
	:	
Debtors	:	Chapter No. 13
	:	
JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	:	
Movant	:	
v.	:	
SHARON T. MYRICK	:	
	:	
Respondents	:	
	:	
	:	
	:	

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO
CONFIRMATION OF THE DEBTORS CHAPTER 13 PLAN**

Movant, **JPMORGAN CHASE BANK, NATIONAL ASSOCIATION**(hereinafter referred to as "Movant"), by its attorneys Phelan Hallinan Diamond & Jones, LLP hereby objects to confirmation of the Debtor's Chapter 13 Plan as follows:

1. Movant is **JPMORGAN CHASE BANK, NATIONAL ASSOCIATION**.
2. Debtor, SHARON T. MYRICK, is the owner of the property located at 428 BROWN STREET, PHILADELPHIA, PA 19123-2106.
3. On July 3, 2017, Movant filed Proof of Claim listing pre-petition arrears in the amount of \$254,685.25. A copy of the Proof of Claim is attached hereto as Exhibit "A" and made a part hereof.
4. Debtor's Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtor's Plan currently provides for payment to Movant in the amount of \$0.00. A copy of the Debtor's Plan is attached hereto as Exhibit "B" and made a part hereof.
6. Debtor's Plan provides for the Debtor's pursuit of a loan modification. Debtor's Plan is speculative in nature in that the Plan contemplates curing the arrears through a loan modification that has neither been offered nor approved. A copy of the Debtor's Plan is attached hereto as Exhibit "B" and made a part hereof.
7. Movant objects to Debtor's Plan as the Plan needs to fund the arrears owed to Movant during the term of the Plan rather than rely on speculation that is based on the possibility of a loan modification that has neither been offered nor approved. Further, Debtor's Plan needs to provide for on-going, post-petition regular monthly mortgage payments to Movant. Confirmation of the Debtor's proposed Plan should be denied.

WHEREFORE, **JPMORGAN CHASE BANK, NATIONAL ASSOCIATION** respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

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Dated: July 12, 2017